

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al., <sup>1</sup>	)	Case No. 01-01139 (AMC)
	)	(Jointly Administered)
Reorganized Debtor.	)	
	)	Related Docket no.: 33124

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**CERTIFICATE OF COUNSEL RE AGREED [PROPOSED] AMENDMENT TO THE  
STIPULATION AND AGREED ORDER RE MEDIATION OF CONTESTED MATTER RE  
CLAIM NO. 18496-1**

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On September 9, 2019, the Court entered the *Stipulation and Agreed Order re Mediation of Contested Matter re Claim no. 18496-1* (the “Mediation Scheduling Order”). The above-captioned reorganized debtor (the “Reorganized Debtor”) and the State of Montana through the Department of Environmental Quality (“MDEQ”) and the National Resources Damage Program (NRDP) hereby agree that the Mediation Scheduling Order should be amended to delete the requirement that State of Montana file a proof of claim on or before November 27, 2019, and the following provision be substituted:

The State of Montana shall file an amended proof of claim no later than 90 days after the mediator files the certificate of completion.

The [Proposed] Amendment to the Stipulation and Agreed Order re Mediation of Contested Matter re Claim no. 18496-1, which is attached hereto as Exhibit A, contains the proposed amendment,

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<sup>1</sup> W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) is the sole remaining Reorganized Debtor and Case no. 01-1139 is the sole remaining open chapter 11 case.

and the Reorganized Debtor and the State of Montana request the Court enter the order substantially in that form.

Dated: November 22, 2019

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